

REMARKS

CLAIM REJECTIONS - 35 U.S.C. § 103

Claims 1-7, 9, 16, 17, 19, 25-27, 29, 30, 32, 33, and 35 are rejected under 35 U.S.C. §103(a) as being obvious in view U.S. Patent No. 6,253,243 issued to Spencer (*Spencer*) and further in view of U.S. Patent No. 6,425,006 issued to Chari et al. (*Chari*). Claims 32, 33 and 35 have been canceled. Thus, the rejection of these claims is moot. Applicant respectfully submits that claims 1-7, 9, 16, 17, 19, 25-27, and 29-30 are not obvious in view of *Spencer* and further in view of *Chari* for at least the reasons described below.

Independent Claims 1, 16, 25, 27, and 29

Claim 1 recites, in part, the following:

obtaining an identifier to identify a class of platforms from the reported detected alert events;
mapping the identifier to a representation of a specific platform type from the class of identified platforms; and
translating said reported alert events to client specific hardware control data via said alert proxy by referring to a platform specific section of an event description file using the mapped representation.

Claims 16, 25, 27 and 29 recite similar limitations.

The Office action states that *Spencer* does not teach or disclose hardware control data while maintaining that *Spencer* teaches translating reported alert events to client specific control data. Applicant agrees that *Spencer* does not teach or disclose hardware control data. But Applicant disagrees that *Spencer* teaches translating reported alert

events to client specific control data. The Office action cites column 2, lines 12-17 of *Spencer* in support of its position. This portion of *Spencer* states that “[a]n MPA translates MIS requests to protocol-specific **primitives**” (emphasis added). Primitives are merely basic operations supported by a particular programming language. Primitives are not the equivalent of control data. Thus, *Spencer* does not teach or disclose translating reported alert events to client specific **control data**, let alone translating reported alert events to client specific **hardware** control data, as claimed by Applicant.

The Office action cites *Chari* as disclosing hardware control data. Applicant submits that *Chari* does not disclose hardware control data. *Chari* discloses a Management Information Base (MIB) that contains variables - not control data - related to the hardware and software components of the server. See column 6, line 62 – column 7, line 1. These variables are used to create information requests. See column 7, lines 1-4. *Chari* does not teach or suggest control data, let alone hardware control data. *Chari* certainly does not teach translating reported alert events to client specific hardware control data, as claimed by Applicant. Thus, *Chari* fails to cure the deficiencies of *Spencer*. Therefore, Applicant respectfully submits claims 1, 16, and 25 are not obvious in view of *Spencer* and further in view of *Chari*.

Claims 2-7 and 9 depend from claim 1. Claims 17 and 19 depend from claim 16. Claim 26 depends from claim 25. Claim 30 depends from claim 29. Given that dependent claims necessarily include the limitations of the claims from which they depend, Applicant respectfully submits that claims 2-7, 9, 17, 19, 25 and 30 are not obvious in view of *Spencer* and further in view of *Chari*.

Dependent Claims 8, 18 and 28

Claims 8, 18 and 28 are rejected under 35 U.S.C. §103(a) as being unpatentable over *Spencer* in view of *Chari* and further in view of U.S. Patent No. 5,689,708 issued to Regnier et al. (*Regnier*). Applicant respectfully submits that claims 8, 18 and 28 are not obvious in view of *Spencer*, *Chari*, and *Regnier* for at least the reasons set forth below.

As discussed above, *Spencer* and *Chari* fail to teach or disclose at least one limitation from each of the independent claims. *Regnier* was cited as teaching additional limitations from dependent claims 8, 18 and 28 including referencing a plain text “ini” file. Whether or not *Regnier* actually teaches this limitation, *Regnier* does not teach or disclose translating reported alert events to client specific hardware control data as claimed by Applicant in claims 1, 16, and 27. Therefore, *Regnier* fails to cure the deficiencies of *Spencer* and *Chari*. Claim 8 depends from claim 1. Claim 18 depends from claim 16. Claim 28 depends from claim 27. Thus, Applicant submits that claims 8, 18, and 28 are not obvious in view of *Spencer*, *Chari*, and *Regnier*.

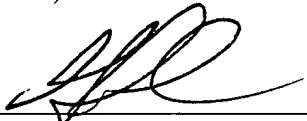
CONCLUSION

In view of the remarks set forth above, Applicant submits that claims 1-9, 16-19, and 25-30 are in condition for allowance and such action is respectfully solicited. The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Please charge any shortages and credit any overcharges to our Deposit Account
number 02-2666.

Respectfully submitted,
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